

# Consultation submission cover sheet

This form accompanies a submission on: **Regulating the advertising of therapeutic goods to the general public**

## Consultation Regulation Impact Statement: *Regulating the advertising of therapeutic goods to the general public*

<b>Name and designation</b>	Charmaine Moldrich, CEO
<b>Company/organisation name and address</b>	Outdoor Media Association, Suite 504 80 William St, East Sydney 2011
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I would like the comments I have provided to be kept confidential: <i>(Please give reasons and identify specific sections of response if applicable)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
I would like my name to be removed from all documents prior to publication and not be included within the list of submissions on the TGA website.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**It would help in the analysis of stakeholder comments if you provide the information requested below.**

<b>I am, or I represent, a: <i>(tick all that apply)</i></b>	
Business in the therapeutics industry <i>(please tick sector)</i> :	
<input type="checkbox"/> Prescription medicines	<input type="checkbox"/> Complementary medicines <input type="checkbox"/> OTC medicines
<input type="checkbox"/> Medical devices	<input type="checkbox"/> Blood, tissues, biological <input checked="" type="checkbox"/> Other
<input type="checkbox"/> Sole trader	<input type="checkbox"/> Business with employees
<input type="checkbox"/> Importer	<input type="checkbox"/> Manufacturer <input type="checkbox"/> Supplier <input checked="" type="checkbox"/> Industry organisation
<input type="checkbox"/> Government	<input type="checkbox"/> Researcher <input type="checkbox"/> Professional body
<input type="checkbox"/> Consumer	<input type="checkbox"/> Consumer organisation <input type="checkbox"/> Institution (e.g. university, hospital)
<input type="checkbox"/> Regulatory affairs consultant	<input type="checkbox"/> Laboratory professional
<input type="checkbox"/> Health professional – <i>please indicate type of practice:</i>	
<input type="checkbox"/> Other - <i>please specify:</i>	

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19 July 2013

Advertising Consultation  
Recalls and Advertising Section  
Office of Product Review  
Therapeutic Goods Administration  
PO Box 100  
WODEN ACT 2606

**To whom it may concern**

Dear Madam/Sir

The Outdoor Media Association (OMA) would like to take this opportunity to support the **Advertising Standards Bureau Submission to the Consultation Regulation Impact Statement: Regulating the advertising of therapeutic goods to the general public.**

The OMA has continually worked to strengthen the self-regulatory system for advertising in Australia, and has put a number of measures in place to ensure that outdoor advertising is responsible across all areas. The work we have done with our members has seen our industry significantly reduce the number of upheld complaints received and we continually work to improve this. The measures we have taken include the following:

- Development of a Content Review Policy
- An on-going program of Content Training for members (undertaken with the assistance of the ASB and the Australian Association of National Advertisers)
- Provision of Copy Advice to members
- Provision of a concept review service for agencies and advertisers in the early concept stage.

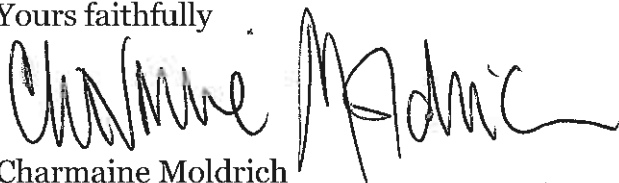
Our *Code of Ethics* ensures that members only endorse advertising that complies with both the Australian Association of National Advertisers (AANA) *Code of Ethics* and other associated Codes, including the *Therapeutic Goods Advertising Code*. As such the outdoor advertising industry has seen the number of complaints and upheld complaints significantly reduced in the past three years:

OMA members' complaints upheld	Number <sup>1</sup>	Percentage <sup>2</sup> Of all Outdoor ads	Percentage of <sup>3</sup> complaints to the ASB (Billboards)	In the Top <sup>4</sup> Ten ads most complained about	AANA Guideline contravened <sup>5</sup>
2011	8	.02%	26.35%	3	Sex, Sexuality and Nudity
2012	3	.01%	4.80%	0	1, Violence, 2 Work Health and Safety
2013	0	0	-	-	-

The OMA has also worked hard to ensure that our members are compliant with decisions made by the ASB in regards to upheld complaints. If a member is the subject of an upheld complaint the advertisement is generally removed within 24-48 hours, weather permitting.

The OMA has an extremely positive working relationship with the ASB and we have worked with them on a number of projects to support self-regulation including our ongoing content training and providing them with a \$1.6 million advertising campaign to increase public awareness in 2011.

Yours faithfully



Charmaine Moldrich  
**Chief Executive Officer**

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- <sup>1</sup> ASB
  - <sup>2</sup> OMA
  - <sup>3</sup> ASB
  - <sup>4</sup> ASB
  - <sup>5</sup> ASB